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August 9, 2017

**VIA ELECTRONIC FILING**

Jocelyn Boyd, Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: Friends of the Earth and Sierra Club v. South Carolina Electric & Gas  
Company  
Docket No. 2017-207-E**

Dear Ms. Boyd:

Enclosed for filing please find a Petition to Intervene on behalf of The Electric Cooperatives of South Carolina, Inc. and Central Electric Power Cooperative, Inc. in the referenced docket. By copy of this letter we are serving same on the parties of record. Please contact me if you have any questions.

Yours truly,

Frank R. Ellerbe, III

FRE:tch  
Enclosures

cc w/enc: J. Blanding Holman, IV, Esquire  
Robert Guild, Esquire  
K. Chad Burgess, Esquire  
Matthew W. Gissendanner, Esquire  
Belton T. Zeigler, Esquire  
Jeffrey M. Nelson, Esquire  
Shannon B. Hudson, Esquire  
Michael N. Couick, Esquire  
Christopher R. Koon, Esquire  
John H. Tiencken, Jr., Esquire  
Paul J. Conway, Esquire

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

IN RE:	)	Docket No. 2017-207-E
	)	
Friends of the Earth and Sierra Club,	)	
Complainant / Petitions,	)	
	)	
v.	)	
	)	
South Carolina Electric & Gas Company,	)	
Defendant / Respondent.	)	
	)	

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**PETITION TO INTERVENE OF  
THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC.  
AND CENTRAL ELECTRIC POWER COOPERATIVE, INC.**

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission's Rules of Practice and Procedure, The Electric Cooperatives of South Carolina, Inc. ("ECSC") and Central Electric Power Cooperative, Inc. ("Central") (jointly referred to as the "Petitioners") hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, ECSC and Central state as follows:

1. On June 22, 2017, Friends of the Earth and Sierra Club filed a complaint requesting that the Commission initiate a formal adjudicatory proceeding to: a) determine the prudence of South Carolina Electric and Gas Company's ("SCE&G") recent acts or omissions in connection with building two new nuclear units at the V.C. Summer plant, b) determine the prudence of abandoning the units as well as the prudence of available least-cost efficiency and renewable energy alternatives, and c) require SCE&G to remedy, abate, and make reparations for unjust and unreasonable rates charged to ratepayers for the new units.

2. ECSC consists of member electric cooperatives organized in the State of South Carolina. ECSC serves as a legal and regulatory representative of its member electric cooperatives. ECSC is the state-wide service and trade association for electric cooperatives in

the state. ECSC's members are twenty consumer-owned electric cooperatives, one wholesale power supply cooperative (Central) and one materials supply cooperative. Together, ECSC's members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all 46 counties use electricity from electric cooperatives. ECSC's principal place of business and mailing address is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

3. Central is a generation and transmission electric cooperative formed under SC Code Section 33-49-10, *et seq.* Central's principal place of business is 20 Cooperative Way, Columbia, South Carolina 29210. Central's mailing address is P.O. Box 1455, Columbia, South Carolina 29202. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the State of South Carolina. Central's distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.

4. ECSC and Central have a substantial interest in the issues to be considered in this proceeding. The nuclear generating units under construction at Jenkinsville are a joint project of SCE&G and the Public Service Authority of South Carolina ("Santee Cooper"). Under a contract between Central and Santee Cooper, Central and the members of ECSC are responsible for seventy percent of Santee Cooper's capital costs. Thus Santee Cooper's share of the cost of the new nuclear units will be borne largely by ECSC members and Central, giving ECSC and Central a direct and significant interest in this proceeding. ECSC and Central seek to intervene to protect the interests of their members.

5. Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners request that they be allowed to intervene in this docket, with full rights to participate as a party of record, including, but not limited to, the ability to engage in discovery and participate in all hearings by offering testimony and exhibits and cross-examining witnesses. Petition requests the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,

Michael N. Couick  
 Christopher R. Koon  
 The Electric Cooperatives of SC, Inc.  
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/s/ Frank R. Ellerbe, III  
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August 9<sup>th</sup>, 2017

Attorneys for Petitioners, The Electric Cooperatives  
 of South Carolina, Inc and  
 Central Electric Power Cooperative, Inc.

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2017-207-E**

In Re:	)	
	)	
Friends of the Earth and Sierra Club,	)	
Complainant / Petitions,	)	<b>CERTIFICATE OF SERVICE</b>
	)	
v.	)	
	)	
South Carolina Electric & Gas Company,	)	
Defendant / Respondent.	)	

This is to certify that I, Toni C. Hawkins, a Paralegal with the law firm of Sowell, Gray, Stepp & Laffitte, LLC, have this day caused to be served upon the person(s) named below the **Petition to Intervene** in the foregoing matter by electronic mail to the email addresses below and by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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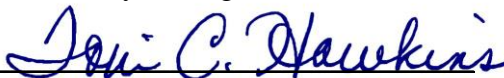
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Dated at Columbia, South Carolina this 9th day of August, 2017.

  
Toni C. Hawkins